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May 4, 2005

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Blue Valley and United Telephone Company of Kansas Petition for
Waiver of the Study Area Boundary Freeze and Section 69.3(e)(11),
CC Docket No. 96-45

Dear Ms. Dortch:

On January 10, 2005, Blue Valley Telecommunications, Inc. ("Blue Valley") and United Telephone Company of Kansas ("United") filed a Joint Petition for Waiver of the "frozen study area" rule, as codified in the Appendix-Glossary of Part 36 of the Commission's rules, in connection with the transfer of approximately 1586 access lines in Kansas from United to Blue Valley.¹ Additionally, Blue Valley also requests a waiver of Section 69.3(e)(11) of the Commission's rules in order to continue to allow it to use NECA as its tariff pool administrator.²

These waivers are necessary to (1) enable United to delete 2 exchanges from its Kansas study area; (2) enable Blue Valley to incorporate these 2 exchanges into its existing study area; and (3) enable Blue Valley to continue to participate in the NECA common line pool, instead of having it file its own interstate tariffs, and assume the cost and administrative burden associated with this process.

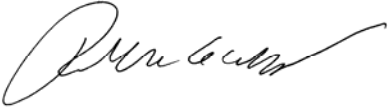
NECA has reviewed the petition, and has no objection to inclusion of the acquired ILEC access lines in the NECA common line tariff. Inclusion of these acquired lines in NECA's tariff will create no undue administrative burden, nor will it result in any disadvantage to other tariff participants.

¹ Joint Petition for Waiver of the Definition of "Study Area" of the Appendix-Glossary of Part 36 of the Commission's Rules, Petition for Waiver of Section 69.3(e)(11) of the Commission's Rules, CC Docket No. 96-45, filed January 10, 2005 (*Petition*).

² *Id.* at 7

NECA looks forward to working with the carriers, USAC, and the Commission in implementing the tariff and data reporting changes necessary to effectuate the proposed transaction.

Sincerely,

A handwritten signature in black ink, appearing to read "Rickard A. Askoff", with a stylized, flowing script.

Rickard A. Askoff

Cc: Gary Seigel, Wireline Competition Bureau, FCC
David Cosson, Kraskin, Moorman, & Cosson, LLC
Tracey Saltenberger, Dep. Gen. Counsel, NECA